

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SONYA LARSON,)	
Plaintiff)	
)	
v.)	C.A. No.: 1:19-CV-10203-IT
)	
DAWN DORLAND PERRY,)	
COHEN BUSINESS LAW GROUP, PC and)	
JEFFREY A. COHEN, ESQUIRE,)	
<u>Defendants</u>)	

**DEFENDANTS COHEN BUSINESS LAW GROUP, PC, AND JEFFREY A. COHEN,
ESQ.’S MOTION TO DISMISS PLAINTIFF SONYA LARSON’S COMPLAINT AND
DEMAND FOR TRIAL BY JURY**

Defendants Cohen Business Law Group, PC, and Jeffrey A. Cohen, Esq. (“Attorney Cohen”) (collectively, the “Firm”) move pursuant to Fed. R. Civ. P. 12(b)(1), (2), and (6) to dismiss Plaintiff Sonya Larson’s (“Larson”) Complaint and Demand for Trial by Jury (“Complaint”).

This case raises an important question of whether an attorney can be liable in tort to a third party for performing routine legal services in pursuit of their client’s interests. But before the Court can address the issues on the merits, it must first determine whether it has subject matter jurisdiction to adjudicate this action and personal jurisdiction over the Firm.

For the reasons set forth in the attached Memorandum of Law, Cohen Business Law Group, P.C. and Jeffrey A. Cohen, Esq. respectfully request that this Court ALLOW their Motion to Dismiss.

REQUEST FOR ORAL ARGUMENT

In accordance with Local Rule 7.1(d), counsel for the Defendants, Cohen Business Law Group, P.C. and Jeffrey A. Cohen, Esquire, hereby requests a hearing for oral argument in connection with this motion.

THE DEFENDANTS,
COHEN BUSINESS LAW GROUP, PC,
AND JEFFREY A. COHEN, ESQUIRE,
BY THEIR ATTORNEYS,

DATED: 04/01/2019

/s/ Matthew H. Greene, Esq. (BBO# 673947)
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L.R. 7.1(a)(2) CERTIFICATION

I, Matthew H. Greene, certify that on March 29, 2019, I conferred with Plaintiff's counsel pursuant to Local Rule 7.1(a)(2), and Plaintiff's counsel indicated that he would oppose this motion.

DATED: 04/01/2019

/s/ Matthew H. Greene, Esq. (BBO# 673947)
Counsel for Defendants, Cohen Business Law Group, PC and Jeffrey A. Cohen, Esquire

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this 1st day of April, 2019.

Counsel for Plaintiff, Sonya Larson:

Andrew D. Epstein, Esq.
Barker, Epstein & Loscocco
176 Federal Street, Suite 502
Boston, MA 02110

Defendant, Dawn Dorland Perry

Appearance not yet entered for this Party

*/s/ Matthew H. Greene, Esq. (BBO# 673947)
Counsel for Defendants, Cohen Business Law Group, PC and
Jeffrey A. Cohen, Esquire*